

**BARCLAY DAMON** LLP

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*Associate*

June 25, 2021

**VIA ECF Filing**

Hon. Christian F. Hummel  
United States District Court, Northern District of New York  
James T. Foley Courthouse  
445 Broadway  
Albany, NY 12207

Re: Jane Doe v. Union College, et al.  
Civil Case No. 1:19-cv-284 GLS/CFH  
Our Matter No. 3106024

Dear Magistrate Hummel:

This firm represents the defendants relative to the above-referenced matter. The following is joint request for an extension of time to complete mandatory mediation and discovery in this action.

As the Court is aware, the parties indicated that it would be beneficial to complete written discovery prior to completing mediation. Written discovery has been completed. In this case, written discovery also including obtaining plaintiff's mental health and medical records relative to the above-referenced matter. Defendants received authorizations to obtain these records from plaintiff on March 25, and 29, 2021. Defendants requested additional authorizations from providers identified in plaintiff's received records. These records were recently obtained by our office.

As written discovery is now completed, the parties would like to mediate this matter before beginning party and non-party depositions. The Civil Case Management Plan (dkt. 42) reflects that plaintiff will seek to take at least eight depositions, and that defendant will have approximately the same number of deponents it wishes to depose. As this will require substantial time and resources of the party, the parties jointly request an extension of time to permit them to mediate this matter and then conduct depositions after mediation is completed.

The parties have been in contact with the agreed-upon mediator in this matter, Ira Lobel. They have discussed dates for mediation and are continuing to confer to find a date which is acceptable to all parties to take place as soon as practicable.

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Based upon the foregoing, the parties request an extension of time to complete mediation and discovery as follows:

- Mandatory mediation to be completed by August 27, 2021;
- Discovery, including party and non-party depositions to be completed by December 2, 2021.

Thank you for your consideration of this request.

Respectfully submitted,

*s/ Brienna L. Christiano*

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